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Sent: Friday, October 06, 2006 2:17 PM
To: Frances, Valerie
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Subject: Comments on the Livestock Committee aquaculture questions

Attachments: ATTACHMENT.TXT

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National Organic Standards Board
c/o Valerie Frances, Executive Director; Executive Director
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October 6, 2006

Dear NOSB Livestock Committee

Thank you for the opportunity to comment on the aquaculture standards. A lot of work has been done to bring the standards this far but more will be required. There still appears to be a lot of misunderstanding about water based farming and how it compares to terrestrial based farming. The inputs for aquaculture are not all that different than the inputs for agriculture once the basis of both systems are compared on an equal footing. My comments are meant to be constructive and to help move the discussion forward.

The Livestock Committee invites input from the organic community, consumers, aquaculture professionals, environmentalists and other interested parties as to how organic aquaculture will meet the requirement of maintaining or improving the environment, including the use of integrated net pen systems as proposed in the Aquaculture Working Group Interim Final Report.

All forms of cultivated food production interact with the environment and change it to some extent. The goal of organic production is to minimize the amount of the change and if possible to improve the productive capacity of the environment (primarily soil) to increase production and to interact with the environment in such a way as to minimize any negative effects. The same is true

for aquaculture.

The Livestock Committee invites input from the organic community, consumers, aquaculture professionals, environmentalists and other interested parties as to how organic aquaculture will meet the requirement of maintaining or improving the environment, including the use of integrated net pen systems as proposed in the Aquaculture Working Group Interim Final Report.

The goals of organic aquaculture are to interact with the environment in such a way that the positive effects are enhanced and the negative effects are minimized. As with terrestrial farming the use of integrated systems design will help aquaculture minimize potential negative impacts such as excessive nutrient loss by capturing nutrients with secondary production systems.

Will the organic consumer find the temporary 12% fish oil and fish meal allowances acceptable and what will consumer reaction be if (in a worst case scenario) certain aquaculture products no longer qualify as organic after the seven year fish oil and fish meal allowance period expires? Will it be possible for other feed ingredients or organic sources of fish oil and fish meal to be developed within this time frame to replace fish oil and fish meal from sustainable capture fisheries?

With full respect for the Livestock Committee I strongly feel that this is completely the wrong debate. The discussion must move from how much fishmeal and fish oil to where are the fishmeal and fish oil being sourced.

Fish (protein - fish meal and oil - fish oil) is the natural diet of many pisciverous animals including salmon and many other marine species. Yet it appears that the NOSB wants salmon and other marine species to eat something else - either vegetable or terrestrial animal by-products. Why would organic production not allow the natural ingredients to be used the diet?

Restricting the inclusion of fishmeal and fish oil to 12% of the diet is without any foundation and appears to be purely arbitrary.

The great majority of organic standard setting groups who have tackled the aquaculture issue have focused on where the inputs are coming from and not on the inclusion rates. IFOAM, The Soil Association, Pacific Organic Seafood Association and many others have set standards which restrict the inputs to being sourced from sustainable fisheries and where ever possible to come from byproduct streams from fish processed for human consumption.

Sourcing proteins from plant sources in many cases will actually increase the size of the ecological footprint for inputs and be more ecologically unsound than supplying inputs from

fisheries.

The use of fishmeal and fish oil have become a contentious issue for organic aquaculture. This is controversy appears to have been the result of a significant misunderstanding about the use of fishmeal and fish oil in animal and crop production systems. Fishmeal has been used for a very long time in the production of livestock including cattle, swine and poultry. It has also been used to improve the growth of crops and as a beneficial soil ameliorant. Several organic organizations allow the use of fishmeal as a nutrient and as a fertilizer without limiting the amount of application.

The use of fishmeal and fish oil to produce fish is a much better use of these materials than using them to produce cattle, poultry and swine. When using fishmeal and fish oil to produce fish we are conserving the biological capital captured in these products in the most efficient and ecologically sound way. Fish are much more efficient at converting these inputs into edible flesh and they are the best at preserving the valuable long chain highly unsaturated fatty acids.

I would encourage the Livestock Committee to work on a standard for sourcing fishmeals and fish oils this will likely be a more productive discussion than a debate on inclusion levels.

The Livestock Committee invites suggestions for appropriate criteria for sources of fish meal and fish oil and methods to verify that sources meet such criteria.

Sources of fishmeal and fish oil should be from sustainable fisheries. The use of fisheries by-products which are suitable should also be allowed. The use of fishmeal and fish oil from sustainable sources and the use of byproducts both are sympathetic to the goals of organic production systems.

Should by-products from processing of terrestrial organic livestock, now prohibited in feeds for organic terrestrial mammals and poultry, be allowed as ingredients in organic aquaculture feeds?

The use of terrestrial animal byproducts is controversial not for scientific reasons but for political and social reasons. This is a bit of curious as most organic standards allow the use of aquatic materials for the production of organic crops. A bit of a one way rule.

The use of terrestrial animal byproducts should be allowed in fish production provided the byproducts are of organic origin.

Thank you.

Most Sincerely,

Brad Hicks
Pacific Organic Seafood Association.